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Attorneys for Defendant COUNTY OF SOLANO

**UNITED STATES DISTRICT COURT**  
**EASTERN DISTRICT OF CALIFORNIA**

ARIANA LYNN, A.E.S. a minor, by and	)	Case No.: 2:23-CV-01738-JAM-SCR
through her guardian ad litem KRISTIN	)	
McKENZIE, et al.,	)	<b><u>FOURTH</u> STIPULATION MODIFYING</b>
	)	<b>PRETRIAL SCHEDULING ORDER;</b>
Plaintiffs,	)	<b>ORDER</b>
	)	
vs.	)	
	)	Complaint Filed: August 16, 2023
COUNTY OF SOLANO, et al.,	)	Trial Date: August 03, 2026
	)	
Defendants.	)	
	)	

Plaintiffs ARIANA LYNN, A.E.S., a minor, by and through her guardian ad litem KRISTIN McKENZIE, N.S., a minor by and through his guardian ad litem KIM SPURGEON, A.M.S., a minor, by and through her guardian ad litem KRISTIN McKENZIE (hereinafter collectively "Plaintiffs") and Defendants the COUNTY OF SOLANO ("County") and JAMES HASKELL AND EMILY HASKELL ("Haskell Defendants"), hereby submit this Stipulation to Further Continue the Pretrial Filing Deadlines.

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1 This case arises from alleged physical and sexual abuse of the four sibling Plaintiffs by the  
2 Haskell Defendants during the time Plaintiffs were placed in the Haskell home by the Defendant  
3 County. Plaintiffs brought claims against the County for civil rights violations and  
4 negligence/failure to perform mandatory duties and against the Haskell Defendants for battery and  
5 intentional infliction of emotional distress.

6 By virtue of the claims at issue, the Parties required access to the Juvenile Files of each  
7 Plaintiff to complete discovery. Petitions for Access to the Juvenile Files of each Plaintiff have  
8 been filed and have finally been resolved with Solano County Superior Court's Juvenile Division  
9 ("Juvenile Court" herein), pursuant to Welfare and Institution Code § 827. The prior request to  
10 continue the pre-trial filing deadlines was due to the outstanding 827 petitions and production of  
11 those files. Although the 827 petitions have now been resolved and documents produced, this  
12 occurred only recently in mid-September 2025, the supplemental document production from the  
13 County is still pending, and the Parties request and additional extension to allow for completion  
14 of necessary discovery based on these records prior to expert disclosure and the close of discovery.

15 Given these circumstances, the case remains in the early stages of discovery and the Parties  
16 have reached a stipulation to request a further two-month continuance of the pretrial filing  
17 deadlines.

### 18 **STIPULATION**

19 This STIPULATION ("Stipulation") is made and entered into by and between all Plaintiffs  
20 and all Defendants appearing in the action, collectively, the "Parties," directly or through counsel  
21 as identified in the signature blocks. The Parties, by and through their undersigned counsel, hereby  
22 jointly stipulate and request the Court modify the Pretrial Scheduling Order.

### 23 **RECITALS & GROUNDS FOR RELIEF**

24 1. The Court entered a Pretrial Scheduling Order on April 15, 2025 (Dkt. #39), setting  
25 forth a Schedule of Pretrial and Trial Dates.

26 2. This matter arises from accusations of physical and sexual abuse against  
27 Defendants James and Emily Haskell by the four sibling Plaintiffs, during the time Plaintiffs were  
28 placed in the Haskell home by Defendant Solano County ("County").

3. The four Plaintiffs now bring this action against the County for civil rights violations and negligence/failure to perform mandatory duties, and bring claims against Defendants James Haskell and Emily Haskell for battery and intentional infliction of emotional distress.

4. By virtue of the claims at issue, the Parties required access to the Juvenile Files of each Plaintiff to complete discovery. Petitions for Access to the Juvenile Files of each Plaintiff were filed with Solano County Superior Court's Juvenile Division, pursuant to Welfare and Institution Code § 827.

5. All four petitions have now been granted, and the Juvenile Court has recently completed production of the juvenile files for each Plaintiff in mid-September 2025.

6. Prior to receipt of the juvenile files, the Parties were been unable to take any depositions for lack of a documentary foundation for any deposition questioning.

7. Additionally, prior to receipt of the juvenile files, the Parties have been unable to meaningfully consult with experts, as these experts are unable to review the critical records contained in the juvenile case files of all four Plaintiffs.

8. Because the final set of juvenile documents were only recently received, the Parties have jointly determined that there is currently insufficient time to complete review of those files, secure expert witnesses, and complete discovery based on the existing pretrial scheduling order.

20. WHEREAS, in light of the circumstances above, GOOD CAUSE supports this Stipulation, in that the policies favoring judicial economy, settlement of disputes, the disposition of cases on the merits, and ends of justice would be served.

THE PARTIES HEREBY STIPULATE, AGREE, AND REQUEST:

That the Court modify the pretrial schedule as follows:

Event	Current Deadline	Proposed New Deadline
Discovery Cutoff Date	12/08/2025	02/09/2026
Disclosure of Expert(s)	10/13/2025	12/15/2025
Deadline		

Supplemental Disclosure Deadline	<b>10/27/2025</b>	<b>12/29/2025</b>
Joint Mid-Litigation Deadline	<b>11/24/2025</b>	<b>1/26/2026</b>
Dispositive Motion Filing Deadline	<b>02/06/2026</b>	<b>04/10/2026</b>
Dispositive Motion Hearing	<b>04/21/2026 @ 1:00 p.m.</b>	<b>06/23/2026 @ 1:00 p.m.</b>
Joint Pretrial Statement Deadline	<b>05/29/2026</b>	<b>07/31/2026</b>
Final Pretrial Conference	<b>06/05/2026 @ 11:00 a.m.</b>	<b>08/07/2026 @ 11:00 a.m.</b>
Jury Trial (10-12 Days)	<b>08/03/2026 @ 9:00 a.m.</b>	<b>10/05/2026 @ 9:00 a.m.</b>

IT IS SO STIPULATED.

This Stipulation may be executed in any number of counterparts, each of which shall be deemed an original, but all of which together shall constitute one and the same instrument. A signed copy of this Stipulation delivered by facsimile, e-mail or other means of electronic transmission shall be deemed to have the same legal effect as delivery of an original signed copy of this Stipulation.

Dated: Oct. 7, 2025      SMITH LAW OFFICES, LLP

By:           /s/ Douglas C. Smith            
Douglas C. Smith, Esq.  
John R. Byerly, Esq.  
Attorney for Defendants  
JAMES HASKELL and EMILY HASKELL

1 Dated: Oct. 7, 2025 WALKUP, MELODIA, KELLY & SCHOENBERGER

2  
3 By: /s/ Clifton Smoot  
4 Khaldoun A. Baghdadi, Esq.  
5 Valerie N. Rose, Esq.  
6 Clifton N. Smoot, Esq.  
7 Attorney for Plaintiffs

8 Dated: Oct. 7, 2025 ANGELO, KILDAY & KILDUFF, LLP

9 By: /s/ Serena M. Warner  
10 Serena M. Warner, Esq.  
11 Attorney for Defendant  
12 COUNTY OF SOLANO  
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**ORDER MODIFYING PRETRIAL SCHEDULING ORDER RDER**

Based on the stipulation of the parties and good cause appearing, the Pretrial Scheduling Order, is **MODIFIED** as follows:

Event	Deadline
Discovery Cutoff Date	<b>02/09/2026</b>
Disclosure of Expert(s) Deadline	<b>12/15/2025</b>
Supplemental Disclosure Deadline	<b>12/29/2025</b>
Joint Mid-Litigation Statement Deadline	Fourteen (14) days prior to the close of discovery
Dispositive Motion Filing Deadline	<b><u>04/03/2026</u></b>
Dispositive Motion Hearing	<b><u>06/16/2026</u>, at 01:00 p.m.</b>
Joint Pretrial Statement Deadline	Seven (7) days prior to the final pretrial conference
Final pretrial conference	<b>08/07/2026, at 11:00 a.m.</b>
Jury Trial (10-12 Days)	<b>10/05/2026, at 9:00 a.m.</b>

All other instructions contained in the December 15, 2023 Pretrial Scheduling Order (ECF No. 28) shall remain in effect.

**IT IS SO ORDERED.**

Dated: October 14, 2025

  
JOHN A. MENDEZ,  
SENIOR UNITED STATES DISTRICT JUDGE